SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lt. Governor

NEW MEXICO
ENVIRONMENT DEPARTMENT

Harold Runnels Building
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BUTCH TONGATE
Cabinet Secretary

J. C. BORREGO
Deputy Secretary

Certified Mail – Return Receipt Requested

October 6, 2017

The Honorable Justin Ingram, Mayor
Village of Fort Sumner
Post Office Box 180
Fort Sumner, New Mexico 88119

Re: Village of Fort Sumner; Minor; NPDES Compliance Evaluation Inspection; NPDES Permit NO. NM0023477; Inspection date: August 29, 2017

Dear Mayor Ingram:

Enclosed please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Introduction, treatment scheme, and problems noted during this inspection are discussed in the "Further Explanations" section of the inspection report.

You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and advised to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address below) in writing within 30 days from the date of this letter. Further, you are encouraged to notify in writing both the USEPA and NMED regarding modifications and compliance schedules at the addresses below:

NPDES Enforcement Coordinator}
Environmental Protection Agency, Region 6 NPDES
Enforcement Branch (6EN-WM)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Program Manager
New Mexico Environment Department
Surface Water Quality Bureau (N2050)
Point Source Regulation Section
P.O. Box 5469
Santa Fe, New Mexico 87502

David Long (Long.David@epa.gov) is USEPA Region 6's Acting NPDES Enforcement Coordinator at the above address. If you have any questions about this inspection report, please contact Sandra Gabaldon at 505-827-1041 or at Sandra.gabaldon@state.nm.us.

Sincerely,

Shelly Lemon, Bureau Chief
Surface Water Quality Bureau

cc: Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
David Long, USEPA (6EN-WM) by e-mail
Amy Andrews, USEPA (6EN-WM) by e-mail
David Esparza, USEPA (6EN-WM) by e-mail
Brent Larsen and Tung Nguyen, USEPA (6WQ-PP) by e-mail
Gladys Gooden-Jackson, USEPA (6EN-WC) by e-mail

John Rhoderick, NMED District I by e-mail

EPA

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

1	Transaction Code	2	NPDES	11	12	yr/mo/day	17	18	Inspec. Type	19	Inspector	20	Fac Type
	N	5	NM0002347			170829					S		

Remarks: VILLAGE OF FT SUMNER

67	Inspection Work Days	69	70	Facility Evaluation Rating	71	BI	72	QA	73	Reserved	74	75	Reserved	80
				1		N		N						

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time /Date	Permit Effective Date
From Santa Fe, 285 south, east on 1-40 to Santa Rosa, Left on US60, Sumner Avenue, Turn right on South 17th Avenue. WWWTP on the right approximately 1.5 miles down the road. **De Baca County**	1030 Hours / August 29, 2017	July 01, 2012
	Exit Time/Date 1340 Hours / August 29, 2017	Permit Expiration Date June 20, 2017 (**No application submitted within 180 days prior to expiration).**

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data
Michael Lucero, Operator, (575) 355-241 Justin Ingram, Mayor	SIC 4952
Name, Address of Responsible Official/Title/Phone and Fax Number The Honorable Justin Ingram, Mayor Village of Fort Sumner Post Office Box 180 Santa Fe, New Mexico 88119	Contacted: Yes * No Latitude: 34.445119 Longitude: -104.23737 (Outfall to River)

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

U	**Permit**	U	**Flow Measurement**	U	**Operations & Maintenance**	N	**CSO/SSO**
U	**Records/Reports**	U	**Self-Monitoring Program**	U	**Sludge Handling/Disposal**	N	**Pollution Prevention**
M	**Facility Site Review**	N	**Compliance Schedules**	N	**Pretreatment**	N	**Multimedia**
M	**Effluent/Receiving Waters**	U	**Laboratory**	N	**Storm Water**	N	**Other:**

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

1. Please see further explanations

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Sandra Gabaldon	**NMED/SWQB/(505) 827-1041/(505) 827-0167**	
Signature of Management QA Reviewer **Shelly Lemon, Bureau Chief, Surface Water Quality Bureau**	**Agency/Office/Phone and Fax Numbers** **NMED/SWQB/(505) 827-2798 /(505) 827-0167**	**Date**

Village of Fort Sumner	PERMIT NO. NM0023477

SECTION A – PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS ☐ S ☐ M ☒ U ☐ NA (*FURTHER EXPLANATION ATTACHED No)*

DETAILS: PERMIT EXPIRED ON JUNE 30, 2017 AND APPLICATION WAS NOT SUMBITTED TO EPA WITHIN THE 180DAY REQUIREMENTS.

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE	☐ Y ☐ N ☒NA
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES	☐ Y ☐ N ☒ NA
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT	☐ Y ☐ N ☒ NA
4. ALL DISCHARGES ARE PERMITTED	☐ Y ☐ N ☒ NA

SECTION B – RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. ☐ S ☐ M ☒ U ☐ NA (*FURTHER EXPLANATION ATTACHED YES)*
DETAILS:

1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs.	☒Y ☐ N ☐ NA
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE.	☐S ☐ M ☒ U ☐ NA
a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING	☐ Y ☒ N ☐ NA
b) NAME OF INDIVIDUAL PERFORMING SAMPLING	☒ Y ☐ N ☐ NA
c) ANALYTICAL METHODS AND TECHNIQUES.	☐ Y ☒ N ☐ NA
d) RESULTS OF ANALYSES AND CALIBRATIONS.	☐ Y ☒ N ☐ NA
e) DATES AND TIMES OF ANALYSES.	☐ Y ☒ N ☐ NA
f) NAME OF PERSON(S) PERFORMING ANALYSES.	☐ Y ☒ N ☐ NA
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE.	☐ S ☐ M ☒ U ☐ NA
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR.	☐ S ☐ M ☒ U ☐ NA
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA.	☐ Y ☒ N ☐ NA

SECTION C – OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. ☐ S ☐ M ☒ U ☐ NA *(FURTHER EXPLANATION ATTACHED (YES)*
DETAILS:

1. TREATMENT UNITS PROPERLY OPERATED.	☐ S ☒ M ☐ U ☐ NA
2. TREATMENT UNITS PROPERLY MAINTAINED.	☐ S ☒ M ☐U ☐ NA
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED .	☒ S ☐ M ☐ U ☐ NA
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE.	☒ S ☐ M ☐ U ☐ NA
5. ALL NEEDED TREATMENT UNITS IN SERVICE	☐ S ☐ M ☒ U ☐ NA
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED.	☐ S ☐ M ☒U ☐ NA
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED.	☐ S ☐ M ☒ U ☐ NA
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE.	☒ Y ☐ N ☐ NA
STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED.	☒ Y ☐ N ☐ NA
PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED.	☐Y ☒ N ☐ NA

Village of Fort Sumner	PERMIT NO. NM023477

SECTION C – OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR?	☐ Y ☒ N ☐ NA
IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED?	☐ Y ☐ N ☒ NA
HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS?	☐Y ☐ N ☒ NA
10.HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT?	☐ Y ☒ N ☐ NA
IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT?	☐ Y ☐ N ☒ NA

SECTION D – SELF-MONITORING

PERMITTEE SELF-MONITORING MEETS PERMIT REQUIREMENTS. ☐ S ☐ M ☒ U ☐ NA *(FURTHER EXPLANATION ATTACHED(YES).*
DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT.	☒ Y ☐ N ☐ NA
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES.	☒ Y ☐ N ☐ NA
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT.	☐ Y ☒ N ☐ NA
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT.	☐ Y ☒ N ☐ NA
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT.	☐Y ☒ N ☐ NA
6. SAMPLE COLLECTION PROCEDURES ADEQUATE	☐ Y ☒ N ☐ NA
a) SAMPLES REFRIGERATED DURING COMPOSITING.	☐ Y ☒ N ☐ NA
b) PROPER PRESERVATION TECHNIQUES USED.	☒ Y ☐ N ☐ NA
c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136.3.	☒ Y ☐ N ☐ NA
7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT?	☐ Y ☐ N ☒ NA

SECTION E – FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. ☐ S ☐ M ☒ U ☐ NA *(FURTHER EXPLANATION ATTACHED (YES)*
DETAILS

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. TYPE OF DEVICE Parshall Flume	☒Y ☐ N ☐ NA
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED.	☒ Y ☐ N ☐ NA
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED.	☐ Y ☒ N ☐ NA
4. CALIBRATION FREQUENCY ADEQUATE.	☐Y ☒ N ☐ NA
RECORDS MAINTAINED OF CALIBRATION PROCEDURES.	☐ Y ☒ N ☐ NA
CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE.	☐ Y ☒ N ☐ NA
5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE.	☒ Y ☐ N ☐ NA
6. HEAD MEASURED AT PROPER LOCATION.	☒ Y ☐ N ☐ NA
7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES.	☒ Y ☐ N ☐ NA

SECTION F – LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. ☐ S ☐ M ☒ U ☐ NA *(FURTHER EXPLANATION ATTACHED (YES)*
DETAILS:

1. EPA APPROVED ANALYTICAL PROCEDURES USED *(40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES)*	☐ Y ☐ N ☐ NA

Village of Fort Sumner	PERMIT NO. NM0023477

SECTION F - LABORATORY (CONT'D)

2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED ☐ Y ☐ N ☒ NA

3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. ☐ S ☒ M ☐ U ☐ NA

4. QUALITY CONTROL PROCEDURES ADEQUATE. ☐ S ☐ M ☒ U ☐ NA

5. DUPLICATE SAMPLES ARE ANALYZED. 0 % OF THE TIME. ☐ Y ☒ N ☐ NA

6. SPIKED SAMPLES ARE ANALYZED. __ % OF THE TIME. ☐ Y ☐ N ☒ NA

7. COMMERCIAL LABORATORY USED. ☒ Y ☐ N ☐ NA

LAB NAME Tucumcari Wastewater Treatment Plant BioAquatics Laboratory

LAB ADDRESS Tucumcari New Mexico Carrollton, Texas

PARAMETERS PERFORMED: BOD, TSS, E. coli Whole Effluent Toxicity

SECTION G - EFFLUENT/RECEIVING WATERS OBSERVATIONS. ☐ S ☐ M ☐ U ☐ NA *(FURTHER EXPLANATION ATTACHED (YES).*

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	None	None	None	None	None	Clear	

RECEIVING WATER OBSERVATIONS: There was an unknown white substance seen at the effluent discharge.

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. ☐ S ☐ M ☒ U ☐ NA *(FURTHER EXPLANATION ATTACHED (YES).*
DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. ☒ S ☐ M ☐ U ☐ NA

2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. ☐ S ☐ M ☒ U ☐ NA

3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: N/A (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES *(FURTHER EXPLANATION ATTACHED NO).*

1. SAMPLES OBTAINED THIS INSPECTION. ☐ Y ☐ N ☒ NA

2. TYPE OF SAMPLE OBTAINED

GRAB _____ COMPOSITE SAMPLE ___ METHOD _____ FREQUENCY

3. SAMPLES PRESERVED. ☐ Y ☐ N ☐ NA

4. FLOW PROPORTIONED SAMPLES OBTAINED. ☐ Y ☐ N ☐ NA

5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. ☐ Y ☐ N ☐ NA

6. SAMPLE REPRESENTATIVE OF VOLUME AND MATURE OF DISCHARGE. ☐ Y ☐ N ☐ NA

7. SAMPLE SPLIT WITH PERMITTEE. ☐ Y ☐ N ☐ NA

8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. ☐ Y ☐ N ☐ NA

9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. ☐ Y ☐ N ☐ NA

Village of Fort Sumner
NPDES Permit No. NM0023477
Compliance Evaluation Inspection
Date of Inspection: August 29, 2017

Introduction:

A Compliance Evaluation Inspection (CEI) was conducted at the Ft. Sumner Wastewater Treatment Plant (WWTP) located in Ft. Sumner, New Mexico on August 29, 2017 by Sandra Gabaldón and Daniel Valenta of the State of New Mexico Environment Department (NMED), Surface Water Quality Bureau (SWQB). This facility is a minor discharger classified under the federal Clean Water Act (CWA), Section 402 National Pollutant Discharge Elimination System (NPDES) permit program, and is assigned NPDES permit number NM0023477. The facility design flow is 0.21 million gallons per day (MGD).

The Ft. Sumner Wastewater Treatment Plant (WWTP) discharges treated effluent directly to the Pecos River in Water Quality Segment 20.6.4.207 of the Pecos River Basin. The designated uses of the receiving stream are irrigation, marginal warm water aquatic life, livestock watering, wildlife habitat and secondary contact.

The NMED performs a specific number of CEI's annually for the United States Environmental Protection Agency (USEPA). The purpose of this inspection is to provide the USEPA with information to evaluate the permittee's compliance with their NPDES permit. The enclosed inspection report is based on verbal information supplied by the permittee's representatives, observations made by the NMED inspectors, and a review of records maintained by the permittee, commercial laboratories, and/or NMED. Findings of the inspection are detailed on the attached EPA form 3560-3 and in the narrative Further Explanations section of the report.

The inspectors arrived at the Ft. Sumner Wastewater Treatment Plant at 1030 hours and conducted an entrance interview with Mr. Michael Lucero, Operator. The Honorable Justin Ingram, Mayor, joined the inspectors soon after. The inspectors made introductions, presented their credentials, and discussed the purpose of the inspection with the representatives present.

Treatment Scheme:

The village sewage collection system has four lift stations, combined with gravity flow that transports waste to the treatment plant. Raw sewage reaches the entrance works where a comminutor grinds large solids and a backup bypass channel to a mechanical bar screen. On the

day of the inspection, the bar screen was inoperable. Solids and grit caught in the bar screen are collected in a hopper and sent to the De Baca County Landfill.

The headworks also consist of an aerated grit chamber and a six-inch Parshall flume. The influent is then lifted by two alternating submersible pumps to Sequencig Batch Reactors (SBR) basins.

Wastewater is processed though alternating cycles of first filling and mixing, then an aerobic, anaerobic, settling and finally a decant phase. Four small blowers provide aeration to these two units. An aerobic sludge digester is located between the two SBR units. Decant water from the SBR basins enter a flow equalization unit (an old Schreiber unit) which ensures an even flow to the disinfection system.

Ultraviolet (UV) disinfection is used at the facility for bacterial control. A a single bank of lights precedes the Parshall Flume with a staff gauge and an ultrasonic flow meter where effluent flow is measured.

Sludge:

Sludge is wasted from the SBRs, and sent to the aerobic digester. Wasted sludge from the digester is then placed in the sludge drying beds for a period of at least 90 days. Decant from the digesters is sent back to the head of the SBR system. The drying beds have underdrains that send liquids back to the headworks.

Solids are also wasted from the old Schreiber system directly to the sludge drying beds. A sump pump with hose attached is used to move the wasted solids (See attached photo).

Dried sludge is moved to another a cement pad, windrowed and allowed to sit on site.

Further Explanations:

Note: The sections are arranged according to the format of the enclosed EPA Inspection Checklist (Form 3560-3), rather than being ranked in order of importance.

ADMINISTRATIVE ORDER: *The Village of Fort Sumner was issued an Administrative Order on November 22, 2016; Docket Number: CWA-06-2016-1833; for violation of the Clean Water Act (CWA) (33 U.S.C. §§1251-1387). Violations include failure to submit monthly DMRs and Noncompliance Reports and Whole Effluent Toxicity (WET) reports.*

On December 15, 2016, Environmental Protection Agency (EPA) received an extension request from the Village of Fort Sumner regarding the timelines set forth in the Administrative Order CWA-06-2016-1833. EPA approved the extension request for submitting a corrective action plan until May 16, 2017.

*The New Mexico Environment Department has **not** received the Village of Fort Sumner's corrective action plan as of the date of this inspection. It is unclear if the corrective action plan was submitted to EPA either.*

Section A – Permit Verification – Overall Rating of "Unsatisfactory"

In Part 40 CFR 122.21(d) states:

(d) *Duty to reapply.*

> ***(1)** Any POTW with a currently effective permit shall submit a new application at least **180 days before the expiration date** of the existing permit, unless permission for a later date has been granted by the Director. (The Director shall not grant permission for applications to be submitted later than the expiration date of the existing permit.)*

Findings for Permit Verification:

The permittee has failed to re-apply for NPDES permit coverage. When asked for a copy of their application, the permittee could not produce a copy nor could they produce verification that the application had been submitted 180 days prior to the expiration of their NPDES permit which expired June 30, 2017.

Section B – Recordkeeping and Reporting Evaluation – Overall Rating of "Unsatisfactory"

Permit requires in Part III, C.4 Record Content:

Records of monitoring information shall include:

a. The date, exact place, and time of sampling measurements;
b. The individual(s) who performed the sampling or measurements;
c. The date(s) and time(s) analyses were performed;
d. The individual(s) who performed the analysis;
e. The analytical techniques or methods used; and
f. The results of such analyses.

40 CFR 122.41 - Conditions applicable to all permits:

Duty to provide information:

The permittee shall furnish to the Director, within a reasonable time, any information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. The permittee shall also furnish to the Director upon request, copies of records required to be kept by this permit.

Findings for Recordkeeping and Reporting:

Tucumcari Wastewater Treatment Plant (WWTP) is the contracted laboratory for the Village of Fort Sumner. Tucumcari does analysis on BOD, TSS and E. coli. The Village of Fort Sumner does their own pH on site.

The facility has not been doing the pH measurement frequency as required by their NPDES permit. pH has not been sampled five days a week. The facility does not provide the method or technique used for pH. The facility is not recording the time sample was taken nor the time the sample was analyzed.

The Tucumcari WWTP provides a chain of custody (COC). The COC does not provide the samples that were received by the WWTP for analysis. The COC does not have signatures of who has relinquished the samples to the WWTP. Tucumcari does provide bench sheets for BOD and TSS for the facility to review but does not provide benchsheets for E. coli for the facility to review and determine an adequate quality control program is in place by the contract laboratory.

The facility could not locate documents requested at the time of this inspection. (DMR's, benchsheets, application for renewal of NPDES permit coverage). The operator did provide a Whole Effluent Toxicity test (WET) done by Bioaquatics in 2016. There are no other WET tests done at this facility. The facility is required to test for WET every six months.

Section **C – Operation and Maintenance – Overall Rating of "Unsatisfactory"**

Permit requires in Part III, Section B.3 Proper Operation and Maintenance:

a. *The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by permittee as efficiently as possible and in a manner which will minimize upsets or discharges of excessive pollutants and will achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of this permit.*

b. *The permittee shall provide adequate operating staff which is duly qualified to carry out operation, maintenance and testing functions required to insure compliance with the conditions of this permit.*

Findings for Operation and Maintenance:

The facility is currently operating with no New Mexico Certified Operator. The Village has an approximate population of 1,031. *20.2.4 NMAC* Utility Operator Certification requires the Village to have a certified Wastewater 3 (WW3) on site. Currently, the Village has two Wastewater Operator 1's (WW1); Both Michael Lucero and Jeremy Mendoza are testing this year for certification in WW2. The operators for the Village are also responsible for collections, and the drinking water system. They are unable to adequately provide operation at the WWTP because of all the other job duties they are tasked to do.

The influent has a "milky" appearance which was deposited a white substance along the channel entering the SBR. It does not to appear to be broken down by treatment, as it is also seen leaving the facility on the channel of the Parshall flume. The facility does accept carcasses from a slaughter house approximately three times a week. It is unknown at this time what the white substance may be.

The influent bar screen has been inoperable for approximately one year.

The facility does not have a spare parts inventory.

Section D – Self-Monitoring – Overall Rating of "Unsatisfactory"

The permit requires in Part I, Section A. Effluent Limitations and Monitoring Requirements:

EFFLUENT CHARACTERISTICS	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	Standard Units			
POLLUTANT	MINIMUM	MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
pH	6.6	9	Five/Week	Instantaneous Grab

EFFLUENT CHARACTERISTICS	DISCHARGE LIMITATIONS						MONITORING REQUIREMENTS	
	lbs/day, unless noted			mg/l, unless noted				
POLLUTANT	30-DAY AVG	DAILY MAX	7-DAY AVG	30-DAY AVG	DAILY MAX	7-DAY AVG	MEASUREMENT FREQUENCY	SAMPLE TYPE
Flow	Report MGD	Report MGD	Report MGD	***	***	***	Daily	Totalizing Meter
Biochemical Oxygen Demand, 5-day	52.54	N/A	78.81	30	N/A	45	Twice/Month	Grab
Biochemical Oxygen Demand, 5-day % removal, minimum	≥ 85% (1)	---	---	---	---	---	Once/Month	Calculation (1)
Total Suspended Solids	52.54	N/A	78.81	30	N/A	45	Twice/Month	Grab
Total Suspended Solids % removal, minimum	≥ 85% (1)	---	---	---	---	---	Once/Month	Calculation (1)
E. Coli Bacteria	N/A	N/A	N/A	548 (2)	2507 (2)		Twice/Month	Grab
Total Residual Chlorine	N/A	N/A	N/A	N/A	19 ug/l (3)	N/A	Daily (3)	Instantaneous Grab (3)

EFFLUENT CHARACTERISTICS	DISCHARGE MONITORING		MONITORING REQUIREMENTS	
	30-DAY AVG MINIMUM	7-DAY MINIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
WHOLE EFFLUENT TOXICITY (PCS 22414) (7-Day NOEC) (4)	37 %	37 %		
Ceriodaphnia dubia (4)	Report	Report	Once/6 Months	24-Hr Composite
Pimephales promelas	Report	Report	Once/6 Months	24-Hr Composite

Findings for Self-Monitoring:

The facility has not sampled and analyzed as required by Section A, Limitations and Monitoring requirements. For instance, the facility provided a bench sheet from August 2017, July 2017, June 2017. The Permittee should have at least two samples/analysis of Biochemical oxygen demand, Total Suspended solids and E. Coli. The bench sheets provided indicate that samples were taken once a month. The facility does not take their pH five times a week as required by the permit.

The operator was asked about WET testing. He stated that they take a large sample, but are not doing a composite sample as required. Last WET test completed was in 2016. The WET test is required to be analyzed every six months at this facility.

The permittee provided minimal records for pH calibration. The permittee is required to calibrate their pH meter to bracket the expected pH. For example, the pH at the Village of Fort Sumner is approximately 7.6 S.U. The bracketed pH would be between the 7and 10 buffers. The operator would calibrate their pH meter for 7 and 10 and check with a buffer of 4.

From the bench sheets provided by the contract laboratory, it is noted that the pH is not being tested prior to analysis. The pH should be in the range of 6.5 – 7.5. If, however, previous

experience indicates that the pH falls between this range, the laboratory does not need to verify this. It is unclear to the inspector if pH has ever been checked prior to beginning the BOD test.

Section E – Flow Measurement – Overall Rating of "Unsatisfactory"

Permit requires in Part III, C.6 Flow measurement:

> *Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated and maintained to insure that the accuracy of the measurements is consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10% from true discharge rates throughout the range of expected discharge volumes.*

Findings for Flow measurement:

The facility has not performed calibration checks. When asked about this, the operators did not know how to perform a "check" between the totalizer and the Parshall flume.

The totalizer has not been calibrated annually.

Section F – Laboratory – Overall Rating of "Unsatisfatory"

Permit requires in Part III, C.5 Monitoring Procedures:

> a. *An adequate analytical quality control program, including the analysis of sufficient standards, spikes and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory.*

Findings for Laboratory:

It appears the facility is not doing 10% duplicate sampling as required by the permit. The inspector was unable to determine if standards are being utilized by the contract laboratory.

Section H – Sludge Disposal – Overall Rating of "Unsatisfactory"

The permit requires in Part IV, Section 1.A General Requirements:

> *The permittee shall handle and dispose of sewage sludge in accordance with Section 405 of the Clean Water Act and all other applicable Federal regulations to protect public*

health and the environment from any unreasonably anticipated adverse effects due to any toxic pollutants which may be present in the sludge.

Findings for Sludge Disposal:

The permittee has stockpiled sludge for longer than two years onsite, therefore becoming a storage site for sludge. This is unacceptable practice and the permittee needs to test and remove the sludge or apply for a sludge only permit.

NMED/SWQB
Official Photograph Log
Photo # 1

Photographer: Daniel Valenta	Date: August 29, 2017	Time: 10:35
City/County: Village of Fort Sumner/De Baca County		State: New Mexico
Location: Village of Ft. Sumner WWTP		
Subject: Influent after the bar screen. (Note: Milky coloration).		

NMED/SWQB
Official Photograph Log
Photo # 2

Photographer: Daniel Valenta	Date: August 29, 2017	Time: 1036 Hours
City/County: Village of Fort Sumner/De Baca County		State: New Mexico
Location: Village of Ft. Sumner WWTP		
Subject: Headworks – (Note: staining of wall with unknown white substance).		

NMED/SWQB
Official Photograph Log
Photo # 3

Photographer: Daniel Valenta	Date: August 29, 2017	Time: 1053 Hours
City/County: Village of Fort Sumner/De Baca County		State: New Mexico
Location: Village of Ft. Sumner WWTP		
Subject: Sequencing Batch Reactor Basin (SBR)		

NMED/SWQB
Official Photograph Log
Photo # 4

Photographer: Daniel Valenta	Date: August 29, 2017	Time: 1053 Hours
City/County: Village of Fort Sumner/De Baca County		State: New Mexico
Location: Village of Ft. Sumner WWTP		
Subject: Effluent after UV disinfection (Note: White unknown substance staining)		

NMED/SWQB
Official Photograph Log
Photo # 5

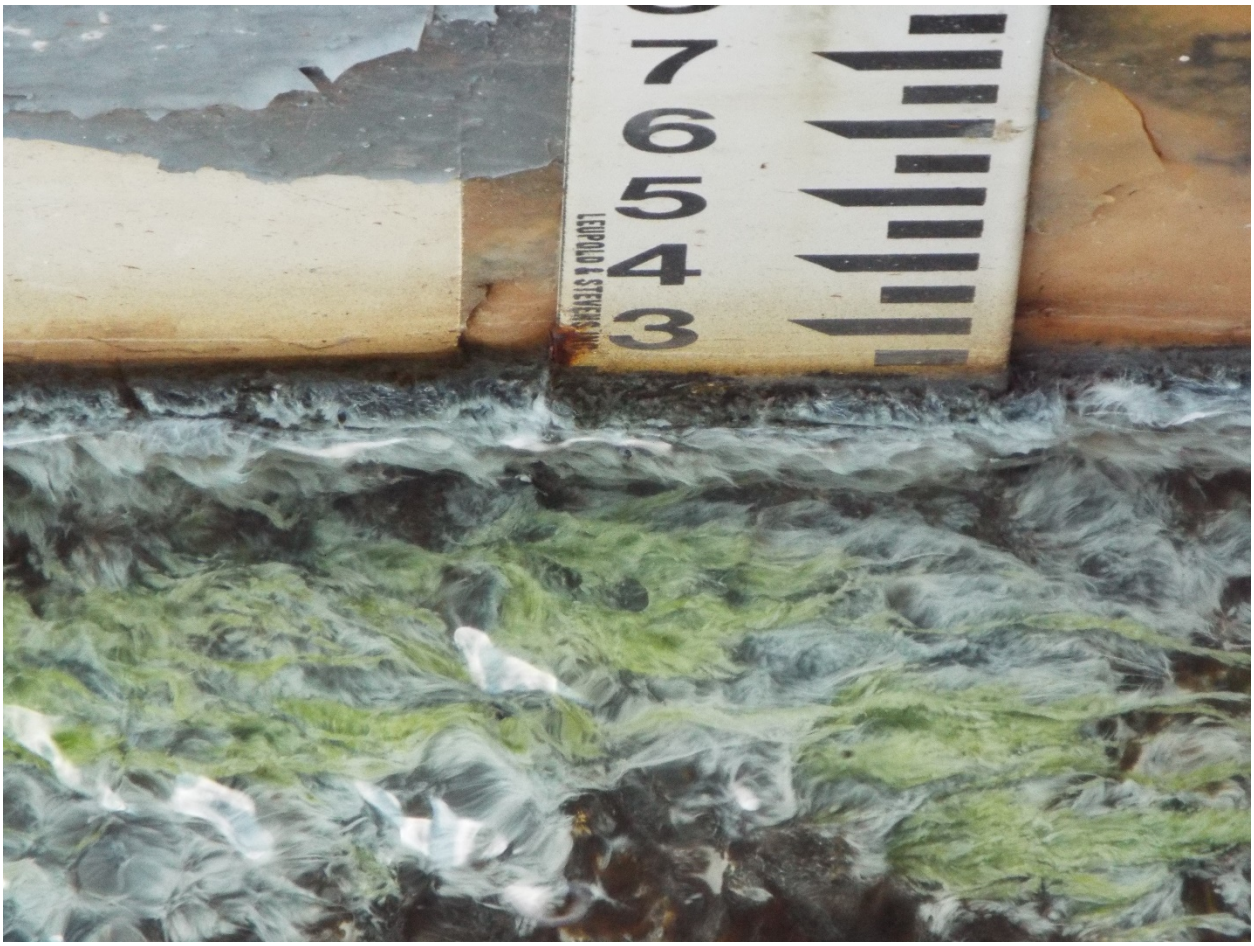
Photographer: Daniel Valenta	Date: August 29, 2017	Time: 1110 Hours
City/County: Village of Fort Sumner/De Baca County		State: New Mexico
Location: Village of Ft. Sumner WWTP		
Subject: Close up of effluent after UV disinfection (Note: White unknown substance staining)		

NMED/SWQB
Official Photograph Log
Photo # 6

Photographer: Daniel Valenta	Date: August 29, 2017	Time: 1111 Hours
City/County: Village of Fort Sumner/De Baca County		State: New Mexico
Location: Village of Ft. Sumner WWTP		
Subject: Effluent channel – unknown white substance		

NMED/SWQB
Official Photograph Log
Photo # 7

Photographer: Daniel Valenta	Date: August 29, 2017	Time: 1112 Hours
City/County: Village of Fort Sumner/De Baca County		State: New Mexico
Location: Village of Ft. Sumner WWTP		
Subject: Effluent Parshall Flume – with coated unknown substance.		



NMED/SWQB
Official Photograph Log
Photo # 8

Photographer: Daniel Valenta	Date: August 29, 2017	Time: 1125 Hours
City/County: Village of Fort Sumner/De Baca County		State: New Mexico
Location: Village of Ft. Sumner WWTP		
Subject: Discharge to surface water.